



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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September 8, 2003

Jay E. Gruber, Esq.
Jeffrey Fialky, Esq.
AT&T Communications of New England, Inc.
99 Bedford Street, 4th Floor
Boston, MA 02111

RE: Verizon Complaint against Teleport Communications Boston
D.T.E. 03-74
Department's First Set of Information Requests

Dear Mr. Gruber and Mr. Fialky:

Attached please find the Department of Telecommunications and Energy's First Set of Information Requests to Teleport Communications Boston in the above-referenced proceeding. Please provide Teleport's responses by September 22, 2003. Contact me with any questions at 617-305-3613.

Sincerely,

Joan Foster Evans
Hearing Officer

cc. Mary Cottrell, Secretary
Michael Isenberg, Director, Telecommunications Division
April Mulqueen, Assistant Director, Telecommunications Division
Paula Foley, Assistant General Counsel
Peter Allen, Telecommunications Division

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS
D.T.E. 03-74**

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Teleport the following Information Requests.

I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Teleport ("Teleport" or "Company") in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Company finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit two (2) copies of the responses to Joan Foster Evans, Hearing Officer, and one copy each to Michael Isenberg, April Mulqueen, and Peter Allen of the Telecommunications Division.

II. Information Requests

Reference Teleport's Answer filed August 7, 2003.

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| DTE-Teleport-1-1 | Does Teleport claim that its Customer Transfer Charges ("CTCs") are reasonable, just, and in compliance with G.L. c.159, §17 because they are cost-based? Does Teleport claim that its CTCs are reasonable, just, and in compliance with G.L. c.159, §17 because they are proxy-based (<u>i.e.</u> , the CTC use a Verizon rate as a proxy)? If yes to both questions, please explain how these charges can be both cost-based and proxy-based. |
| DTE-Teleport-1-2 | Please submit cost studies to support the CTCs that appear in Teleport's Tariff No. 1. Such cost studies should include, at a minimum, all tasks associated with CTCs as well as the relevant work times and labor costs. |
| DTE-Teleport-1-3 | Under what costing methodology should the Department evaluate Teleport's CTCs? Why? |
| DTE-Teleport-1-4 | Does Teleport have a wholesale tariff on file with the Massachusetts DTE? Is Teleport's Tariff No. 1 a wholesale or a retail tariff? Are Teleport's CTCs a wholesale or a retail offering? |